

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MMR GROUP, INC.,  
MMR POWER SOLUTIONS, LLC and  
SOUTHWESTERN POWER GROUP II, LLC,

**Plaintiffs,**

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR  
MILLENNIUM, LLC), SOLAR TRUST OF  
AMERICA, LLC, SOLAR MILLENNIUM AG,  
SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,  
PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR  
II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,  
LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,  
LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC  
AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC

#### Defendants.

Case No. 3:11-cv-01521-EMC

**STIPULATION REGARDING  
SUBSTITUTION OF  
COUNSEL AND  
[PROPOSED] ORDER**

**The Honorable Judge  
Edward M. Chen**

**TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that, subject to approval by the Court, Defendants STA Development, LLC, Solar Trust Of America, LLC, Solar Millennium, Inc., CA I-10 Solar, LLC, Palo Verde Solar I, LLC, Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC, and Blythe Solar Power Project Unit 4, LLC (the “Defendants”) hereby substitute Michael R. Haven of K&L Gates LLP, California State Bar No. 208721, as their attorney of record in place of Milbank, Tweed, Hadley & McCloy LLP and the individual attorneys at Milbank, Tweed, Hadley & McCloy LLP who have appeared in this litigation.<sup>1</sup>

<sup>1</sup> The individual attorneys who have appeared in this action include David R. Gelfand, Jerry L. Marks, Aaron L. Renenger, Caitlin Hawks, and Rachel Penski Fissell.

1 All pleadings, notices, orders, and other papers in the above-captioned matter should  
2 henceforth be served upon:

3 Michael R. Haven  
4 K&L Gates LLP  
5 630 Hansen Way  
6 Palo Alto, CA 94304  
mike.haven@klgates.com

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1 Dated: May 8, 2012

**K&L GATES LLP**

3 By: /s/ \_\_\_\_\_

4 Michael R. Haven (SBN 208721)  
5 630 Hansen Way  
6 Palo Alto, California 94304  
Telephone: (650) 798-6772  
Facsimile: (650) 798-6701

7 **MILBANK, TWEED, HADLEY & McCLOY LLP**

9 By: /s/ \_\_\_\_\_

10 Aaron Renenger (SBN 222675)  
11 601 S. Figueroa Street, 30th Floor  
12 Los Angeles, California 90017  
Telephone: (213) 892-4000  
Facsimile: (213) 629-5063

13 I consent to the above substitution:

15 By:   
16

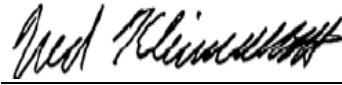
17 Edward Kleinschmidt  
18 *President and Chief Operating Officer, Solar Trust of America*

19 *Chief Restructuring Officer, STA Development, LLC,*  
20 *Solar Trust Of America, LLC, CA I-10 Solar, LLC,*  
21 *Palo Verde Solar I, LLC, and Palo Verde Solar II,*  
22 *LLC*

23 By: \_\_\_\_\_

24 Werner Thonack  
25 *President, Treasurer and Secretary, Solar Millennium, Inc., manager of Blythe Solar Power Project Unit 3, LLC, and Blythe Solar Power Project Unit 4, LLC*

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By: 

Edward Kleinschmidt

*Chief Restructuring Officer*, STA Development, LLC,  
manager of Blythe Solar Power Project Unit 1, LLC  
and Blythe Solar Power Project Unit 2

The substitution of attorney is hereby approved and so ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_ UNITED STATES DISTRICT JUDGE

1 Dated: May 8, 2012

K&L GATES LLP

2 By: /s/

Michael R. Haven (SBN 208721)  
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11 I consent to the above substitution:

12 By: \_\_\_\_\_

Edward Kleinschmidt  
*President and Chief Operating Officer*, Solar Trust of America

15 *Chief Restructuring Officer*, STA Development, LLC,  
16 Solar Trust Of America, LLC, CA I-10 Solar, LLC,  
17 Palo Verde Solar I, LLC, and Palo Verde Solar II,  
LLC

18 By: \_\_\_\_\_

Werner Thonack  
*President, Treasurer and Secretary*, Solar Millennium, Inc., manager of Blythe Solar Power Project Unit 3, LLC, and Blythe Solar Power Project Unit 4, LLC

22 By: \_\_\_\_\_

Edward Kleinschmidt  
*Chief Restructuring Officer*, STA Development, LLC, manager of Blythe Solar Power Project Unit 1, LLC and Blythe Solar Power Project Unit 2

26 The substitution of attorney is hereby approved and so ORDERED.

27 Dated: \_\_\_\_\_

28 UNITED STATES DISTRICT JUDGE